



Wilson Sonsini Goodrich & Rosati
Professional Corporation
1301 Avenue of the Americas
40th Floor
New York, New York 10019-6022
O: 212.999.5800
F: 212.999.5899

August 5, 2020

VIA CM/ECF

The Honorable Pamela K. Chen
United States District Judge
Eastern District of New York
271 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Bo Mao, No. 1:19-cr-00392-PKC

Dear Judge Chen:

We represent the defendant, Professor Bo Mao, in the above-captioned criminal case. We have raised certain issues with the Government related to our pre-trial motions, and discussions relating to those issues are being addressed by both sides expeditiously and in good faith. As we want to make sure we have fully covered the issues in advance of the filing our motions, and with the consent of the Government, we respectfully request a two-week adjournment of the date to file pre-trial motions. The resulting schedule would have the motions filed on August 21, 2020, responses filed by September 18, 2020, and replies filed by October 21, 2020.

We thank the Court in advance for its courtesy in this regard.

Respectfully submitted,

WILSON SONSINI GOODRICH & ROSATI
Professional Corporation

s/ Morris J. Fodeman

Morris J. Fodeman
Michael S. Sommer

THOMPSON & KNIGHT LLP

s/ Richard B. Roper, III

Richard B. Roper, III

Counsel for Professor Bo Mao

cc: All Counsel of Record (via CM/ECF)